

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

ANTONIO FAVORS
3519 Chesapeake Drive
Nashville, TN 37207

Plaintiff;

v.

Civil No. 487457V

MOHAMMADREZA JOURABLI
1500 Lincoln Street, Apt. 318
McLean, VA 22101

and

LYFT, INC.
2300 Harrison Street
San Francisco CA 94110
Please Serve
Corporation Trust Inc.
2405 York Road, Ste#201
Lutherville-Timonium, MD 21093

Defendants.

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Clerk of the Circuit Court
Montgomery County, Md.

COMPLAINT

Plaintiff, Antonio Favors, by and through his attorneys, INMAN KAMINOW, P.C., and David J. Kaminow, complains against defendants Mohammadreza Jourabli ("Jourabli") and Lyft, Inc. ("Lyft"), and for cause states:

JURISDICTION AND VENUE

1. At all times relevant hereto, plaintiff was an adult citizen of Montgomery County, Maryland.
2. At all times relevant hereto, defendant Jourabli was an adult citizen of Virginia, residing at the above captioned address.

EXHIBIT A

3. At all times relevant hereto, Lyft was a corporate entity licensed to do business, and doing business, within the state of Maryland.

4. At all times relevant hereto, Lyft acted through its actual or apparent agents, servants, and/or employees, including, but not limited to, defendant Jourabli, who were, at all times relevant hereto, acting within the scope of their actual or apparent agency, duties and/or employment.

4. This Court has jurisdiction over this matter because the amount in controversy is in excess of \$30,000.00 (Thirty Thousand Dollars).

5. Venue is properly in this jurisdiction wherein the acts complained of took place.

6. This Court has personal jurisdiction over defendant Jourabli because the acts complained of occurred in the State of Maryland.

7. This Court has jurisdiction over defendant Lyft, which conducts business within the state of Maryland.

COUNT I
(NEGLIGENCE - JOURABLI)

8. Plaintiff incorporates by reference the allegations of paragraphs 1 through 7 as though fully set forth herein.

9. On or about the 6th day of October, 2018, plaintiff was a passenger in a vehicle owned and operated by defendant Jourabli.

10. At the same time and place, defendant Jourabli was working as an agent, servant, and/or employee of defendant Lyft, acting within the scope of his agency, service and/or duties..

11. The vehicle was in a parking lot at or near 1390 Rockville Pike in Rockville, Montgomery County, Maryland.

12. Plaintiff began to exit the vehicle, but defendant Jourabli negligently began to drive away before plaintiff had completely exited.

13. At the time of the incident, defendant owed plaintiff the duties of:

a. Using that degree of care and skill necessary to properly control his vehicle;

b. Complying with all applicable laws, statutes, codes, and other regulations then and there in effect;

c. Maintaining his vehicle stopped until plaintiff had fully and completely exited;

d. Paying full time and proper attention to his driving; and

f. Otherwise to be determined during discovery pursuant to the Maryland Rules of Civil Procedure.

14. Defendant was negligent and breached his duties as aforesaid, causing the above described collision.

15. At no time was plaintiff contributorily negligent, nor did he assume the risk of his injuries.

16. As a direct and proximate result of defendant Jourabli's negligence, and through no negligence on his own part, plaintiff suffered serious injury, including, but not limited to, medical invoices in the past, present and future; lost wages; conscious pain and suffering in the past, present and future; and property damage.

WHEREFORE, plaintiff respectfully demands judgment against the defendant Jourabli, for compensatory damages in an amount in excess of Seventy Five Thousand Dollars (\$75,000.00), and for whatever other and further relief may be required in the interest of justice.

**COUNT II
(NEGLIGENCE - LYFT)**

17. Plaintiff hereby incorporates by reference the factual allegations of paragraphs 1 through 17 above as though fully set forth herein.

18. Lyft negligently retained defendant Jourabli to act as its agent, servant and/or employee without properly ensuring that defendant Jourabli was competent and had the proper disposition to adequately handle the demands of his agency, service and/or employ.

19. As a direct and proximate result of defendant Lyft's negligence, and through no negligence on his own part, plaintiff suffered serious injury, including, but not limited to, medical invoices in the past, present and future; lost wages; conscious pain and suffering in the past, present and future; and property damage.

WHEREFORE, plaintiff respectfully demands judgment against the defendant Lyft, for compensatory damages in an amount in excess of Seventy Five Thousand Dollars (\$75,000.00), and for whatever other and further relief may be required in the interest of justice.

**COUNT III
(IMPUTED NEGLIGENCE - LYFT)**

20. Plaintiff hereby incorporates by reference the factual allegations of paragraphs 1 through 19 above as though fully set forth herein.

21. At all times relevant hereto, defendant Jourabli was an agent, servant, and/or employee of defendant Lyft, acting within the scope of his agency, service, and/or duties.

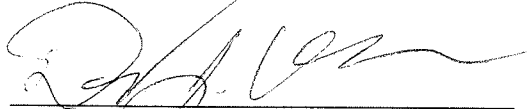
22. In the alternative, at all times relevant hereto, defendant Jourabli was the apparent agent, servant and/or employee working within the scope of his apparent agency, service and/or employment.

23. As a direct and proximate result of defendant Jourabli's negligence, and through no negligence on his own part, plaintiff suffered serious injury, including, but not limited to, medical invoices in the past, present and future; lost wages; conscious pain and suffering in the past, present and future; and property damage.

24. Defendant Lyft is liable to plaintiff based on the actual or apparent agency of defendant Jourabli.

Respectfully submitted,

INMAN KAMINOW, P.C.



David J. Kaminow, #9312150110

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9200 Corporate Boulevard

Suite 480

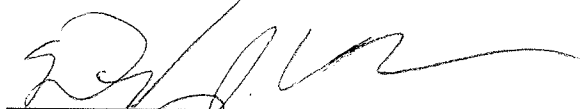
Rockville, MD 20850

301-315-9400

Attorneys for plaintiff

JURY DEMAND

Plaintiff hereby demands a jury as to all matters to be tried herein.



David J. Kaminow, #9312150110